UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA
PLAINTIFF,

VS.

LERHUE WILLIAM FREEMAN-PAYNE
DEFENDANT.

CASE #: 10-20235

HON. DENISE PAGE HOOD

AUSA Terrence Haugabook
U.S. Attorney's Office
211 W. Fort Street, Suite 2001
Detroit, MI 48226

Margaret Sind Raben (P39243)
Gurewitz & Raben, PLC
333 W. Fort Street, Suite 1400
Detroit, MI 48226
(313) 628-4708

MOTION TO EXTEND REPORTING DATE

Defendant LeRhue Freeman-Payne by his attorney Margaret Sind Raben hereby requests this Court enter an Order extending his self-surrender reporting date by sixty (60) days. Counsel for Defendant Freeman-Payne contacted AUSA Haugabook seeking concurrence in the requested relief. AUSA Haugabook does not concur.

Respectfully Submitted,

GUREWITZ & RABEN, PLC

By: s/Margaret Sind Raben
333 W. Fort Street, Suite 1400
Detroit, MI 48226
(313) 628-4708
Email: msraben@aol.com
Attorney Bar Number: 39243

Date: July 13, 2015

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BRIEF IN SUPPORT OF MOTION TO EXTEND REPORTING DATE

Defendant LeRhue Freeman-Payne by his attorney Margaret Sind Raben hereby requests this Court enter an Order extending his self-surrender reporting date. For his reasons, Defendant Freeman-Payne states as follows:

1. On June 2, 2015, Defendant Freeman-Payne was sentenced by this Court, in relevant part, to concurrent terms of 6 months imprisonment for his convictions of Conspiracy to Distribute Controlled Substance and Use of a Telephone in furtherance of a drug crime.
2. At sentencing, this Court permitted Defendant to self-surrender to the Bureau of Prison when notified by the US Marshals Service to report but stated that no extensions of time would be granted.
3. On June 25, 2015, counsel informed Defendant that his voluntary surrender date is July 15, 2015 at 12:00 p.m. (Noon) to FCI Allenwood (Low) in White Deer, PA.
4. Defendant has not been able to complete contracted and scheduled construction work due to the heavy rains this Spring. A 60 day extension would permit Defendant time to

complete his work-in-progress and close his construction business before reporting to FCI Allenwood.

4 On July 2, 2015, counsel for Defendant filed a Notice of Appeal to preserve Defendant's right to appeal. Defendant is still deciding whether to proceed with his appeal or dismiss the appeal and file a 2255 motion.

5. The Sixth Circuit has set an expedited briefing schedule for Defendant's appeal, i.e., a "short sentence" appeal. The briefing schedule provides that all briefing will be filed by the end of August 2015.

6. Counsel for Defendant will best be able to continue to counsel and advise Defendant if he remains in the Eastern District of Michigan for another 60 days

WHEREFORE Defendant LeRhue Freeman-Payne respectfully requests this Court enter an Order extending Defendant's self-surrender date by 60 days to September 15, 2015.

Respectfully Submitted,

GUREWITZ & RABEN, PLC

By: s/Margaret Sind Raben
333 W. Fort Street, Suite 1400
Detroit, MI 48226
(313) 628-4708
Email: msraben@aol.com
Attorney Bar Number: 39243

Date: July 13, 2015

CERTIFICATE OF SERVICE

I hereby certify that on July 13, 2015, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all parties of record.

s/Margaret Sind Raben (P39243)
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